

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:) Chapter 11
)
CIRCUIT CITY STORES, INC., et al.,) Case No. **08-35653**
)
Debtors.) Jointly Administered

VERIFIED STATEMENT OF GREGORY KAPLAN, PLC
PURSUANT TO BANKRUPTCY RULE 2019

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Gregory Kaplan, PLC (“Gregory Kaplan”) makes the following disclosure in connection with the Chapter 11 cases (the “Cases”) of Circuit City Stores, Inc. and its related affiliates (collectively, the “Debtors”):

1. Gregory Kaplan represents the individuals and entities identified on Exhibit A (the “Parties”) who may hold claims against and/or interests in the Debtors arising out of applicable agreements, law or equity pursuant to their relationships with the Debtors (the “Claims”).

2. The facts and circumstances relating to the employment of Gregory Kaplan are that Gregory Kaplan serves as bankruptcy counsel to the Parties to represent their interests in the Debtors’ jointly administered bankruptcy cases.

3. Each of the Parties requested that Gregory Kaplan represent them in connection with the Cases.

Troy Savenko (Va. Bar No. 44516)
Leslie A. Skiba (Va. Bar No. 48783)
GREGORY KAPLAN, PLC
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*Counsel for Ada Alicea, on Behalf of Herself and All Others
Similarly Situated; AmREIT, a Texas Real Estate Investment
Trust; Liquid Asset Partners, LLC; and PlumChoice, Inc.*

4. Gregory Kaplan has complied with its ethical obligations with respect to advising the Parties regarding this concurrent representation.

5. Upon information and belief, Gregory Kaplan does not possess and has not possessed in the past any claim against or interests in any of the Debtors.

6. In the event Gregory Kaplan undertakes additional representation of other clients in the Cases, this statement shall be supplemented in accordance with Bankruptcy Rule 2019.

7. Gregory Kaplan reserves its rights as to the applicability of Bankruptcy Rule 2019 to attorneys and law firms representing clients in Chapter 11 cases.

8. The undersigned declares under penalty of perjury that this Verified Statement is true and accurate to the best of his knowledge, information and belief.

Dated: April 27, 2009

Respectfully submitted,

/s/ Troy Savenko

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and All Others Similarly Situated; AmREIT,
a Texas Real Estate Investment Trust;
Liquid Asset Partners, LLC; and
PlumChoice, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2009, a copy of the foregoing was filed and served via the Court's Electronic Case Filing System on all parties that have requested notice of papers with the Court's CM/ECF Noticing System pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

/s/ Troy Savenko

EXHIBIT A

| <u>Name of Interested Party</u> | <u>Address</u> | <u>Nature of Claim</u> |
|--|--|--|
| Ada Alicea, on behalf of herself and all others similarly situated | 2685 University Avenue Bronx, NY 10468 | Redress for Debtor's deceptive and otherwise improper business practice of imposing "restocking fees." |
| AmREIT, a Texas Real Estate Investment Trust | 8 Greenway Plaza Suite 1000 Houston, TX 77046-0808 | Claims arising from breach of non-residential real property lease. |
| Liquid Asset Partners, LLC | 4700 36 th Street Grand Rapids, MI 49512 | Asset purchaser. |
| PlumChoice, Inc. | 5 Federal Street Billerica, MA 01821 | Claims arising from breach of multiple contracts. |